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February 14, 2018

VIA ECF

The Honorable Vera M. Scanlon
United States District Court
Eastern District of New York
225 Cadman Plaza East, 505 North
Brooklyn, New York 11201

Re: *Coleen Hammer v. Bank of America, et al.*,
Case No. 1:17-cv-6602-ILG-VMS (E.D.N.Y.)

Dear Judge Scanlon:

We write jointly on behalf of the parties to the above-referenced action to request a one-week extension of today's deadline for the submission of a proposed confidentiality order.¹

In the twelve days since the initial conference held on February 2, 2018, the parties have exchanged numerous detailed emails and several drafts in an effort to reach agreement on a proposed confidentiality order. Although the parties have diligently negotiated in good faith and are making progress toward a resolution, the meet-and-confer process is ongoing and several issues remain in dispute.

Accordingly, the parties respectfully request a one-week extension of the deadline to submit a proposed confidentiality order, making the new deadline February 21, 2018. All parties agree that this extension will be sufficient to address the outstanding issues and that it will not affect any other dates set forth in the Court's February 5, 2018 Scheduling Order (ECF No. 35), including the February 23, 2018 deadline for the exchange of initial disclosures and production of preliminary documents necessary to facilitate settlement discussions.

Please do not hesitate to contact us should the Court have any questions or further instructions.

¹ Although Citibank is reviewing the parties' proposed recommendations for a confidentiality order per the Court's direction, it still maintains that the claims against Citibank are subject to mandatory arbitration, and a motion to compel arbitration shall be forthcoming.

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Respectfully submitted,

/s/ Joseph J. Boylan
Joseph J. Boylan

cc: All counsel of record (via ECF)